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C.L. "Butch" Otter, Governor John H. Tippets, Director

December 18, 2018

Ted Buchanan, Director Safety & Environmental Jayco Inc Plant #2 511 Hankins Road South Kimberly, ID 83341

RE:

Facility ID No. 083-00097, Jayco Inc Plant #2, Kimberly

Final Permit Letter

Dear Mr. Buchanan:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0103 Project 62099 to Jayco Inc Plant #2 located at Kimberly for the PTC modification to install two additional trailer assembly lines. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received August 20, 2018.

This permit is effective immediately and replaces PTC No. P-2011.0103 issued on May 25, 2011. This permit does not release Jayco Inc Plant #2 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office 650 Addison Avenue West, Suite 110, 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Twin Falls Regional Manager Bobby Dye, at (208) 735-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon

Stationary Source Program Manager

Air Quality Division

MS\tb

Permit No. P-2011.0103 PROJ 62099

Enclosures

Printed on Recycled Paper

# **Air Quality**

### **PERMIT TO CONSTRUCT**

Permittee Jayco Inc Plant #2

Permit Number P-2011.0103

Project ID 62099

**Facility ID** 083-00097

**Facility Location** 511 Hankins Road South

Kimberly, Idaho 83341

# **Permit Authority**

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

**Date Issued** 

December 18, 2018

Tom Burnham, P.E., Permit Writer

Mike Simon, Stationary Source Manager

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# 1 Permit Scope

### **Purpose**

- 1.1 This is a modified permit to construct (PTC) to install two additional trailer assembly lines.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2011.0103, issued on May 25, 2011.

### **Regulated Sources**

Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 Regulated Sources** 

<b>Permit Section</b>	Source Description	Emissions Control(s)
2	Fuel Burning Equipment  Building 1  (4) 0.58 MMBtu/hr heat input capacity natural gas heaters  Manufacturer: ThermoCycler  Model: GTC-480M  Building 2  (8) 0.95 MMBtu/hr heat input capacity natural gas heaters  Manufacturer: Cambridge Engineering Inc.  Model: S950	None
3	RV Assembly Line 1 Self-Constructed: 2011 Capacity: 32 Units/day	None
3	RV Assembly Line 2 Self-Constructed: 2018 Capacity: 30 Units/day	None
3	RV Assembly Line 3 Self-Constructed: 2018 Capacity: 30 Units/day	None
4	Woodworking Operations Self-Constructed: 2011 Capacity: 15,000 lbs of wood per hour	Dust Collector Manufacturer: Donaldson Torit Year Manufactured: 2011 Model: 276RF10 PM efficiency: 99%

[12/18/2018]

## 2 Natural Gas Heaters

### 2.1 Process Description

There are three 0.58 MMBtu/hr space heaters in building 1 and eight 0.95 MMBtu/hr space heaters in building 2. These heaters are used to heat the buildings.

### 2.2 Control Device Descriptions

**Table 1.1 Natural Gas Heaters Description** 

Emissions Units / Processes	Control Devices	Emission Points
Building 1 heaters	None	Doors, windows, and vents Building 1
Building 2 heaters	None	Doors, windows, and vents Building 2

[12/18/2018]

### **Emission Limits**

### 2.3 Emission Limits

The emissions from the Natural Gas Heaters shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 1.2 Natural Gas Heaters Emission Limits (a)

Source Description	PM	10 <sup>(b)</sup>	S	$O_2$	N	O <sub>x</sub>	C	o	V	OC
Source Description	lb/hr <sup>(c)</sup>	T/yr (d)	lb/hr <sup>(c)</sup>	T/yr (d)	lb/br (c)	T/yr (d)	lb/hr <sup>(c)</sup>	T/yr (d)	lb/hr (c)	T/yr (d)
Building 1 heaters	0.04	0.05	0.01	0.01	0.44	0.57	0.37	0.48	0.02	0.03
Building 2 heaters	0.07	0.08	0.01	0.01	0.85	1.10	0.72	0.93	0.05	0.06

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[12/18/2018]

### 2.4 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

[12/18/2018]

### 2.5 Opacity Limit

Emissions from the natural gas heaters, or any stack, vent, or functionally equivalent opening associated with the Natural Gas Heaters, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[12/18/2018]

### **Operating Requirements**

### 2.6 Fuel Usage

The natural gas used by the facility shall not exceed 36.2 million standard cubic feet per year (MMscf/yr) per any consecutive 12 month period. The building 1 heaters and building 2 heaters shall only combust natural gas fuel.

[12/18/2018]

### 2.7 Fuel Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of natural gas used by the facility for the previous month (scf/mo) and for the previous 12 calendar months (scf/yr) to demonstrate compliance with the Fuel Usage limit.

[12/18/2018]

# 3 RV Assembly Lines

### 3.1 Process Description

The RV assembly lines include adhesive application by spraying or rollcoating to secure parts, degreasing/solvent wiping to clean aluminum and fiberglass prior to applying decals, caulking to seal joints, touch-up and repair painting for scratches and maintenance (plastic, fiberglass, wood and metal substrates).

[12/18/2018]

### 3.2 Control Device Descriptions

Table 3.1 RV Assembly Lines Description

Emissions Units / Processes	Control Devices	Emission Points	
EU-L1	None	Doors, windows, vents Bldg. 1	
EU-L2	None	None Doors, windows, vents Bldg. 2	
EU-L3	None	Doors, windows, vents Bldg. 2	

[12/18/2018]

### **Emission Limits**

### 3.3 HAP Emission Limits

- HAP emissions from the facility shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- HAP emissions from the facility shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

### 3.4 VOC Emissions Limit

VOC emissions from the facility shall not exceed 95 tons per any consecutive 12-month period (T/yr).

### 3.5 TAP Emissions Limit

TAP emissions increment from the facility shall remain below each respective ambient increment (AAC or AACC) as listed in IDAPA 58.01.01.585-586.

### **Operating Requirements**

### 3.6 Throughput Limits

The maximum number of RV's produced per day shall not exceed 92.

[12/18/2018]

### 3.7 Work Practices

The permittee shall keep all VOC product containers covered/closed when not in use.

### 3.8 Material Purchase Records

The permittee shall maintain the purchase records of all RV assembly line materials that contain HAPs, TAPs, and/or VOCs including but not limited to, adhesives, caulks, degreasers, solvents, and paints. The purchase records shall remain on site and shall be made available to DEQ representatives upon request.

### 3.9 Material Safety Data Sheets

The permittee shall maintain the MSDS' for the RV assembly line materials purchases and used at the facility for a period of five years. If the constituents of any product are changed, a record of the date of commencement of usage of the new product shall be kept as well as both the old and new MSDS'. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.

### Monitoring and Recordkeeping Requirements

### 3.10 Daily Throughput Monitoring

The permittee shall monitor and record the number of RVs produced per day to demonstrate compliance with Permit Condition 3.6. Records of this information shall remain onsite and shall be made available to DEQ representatives upon request.

### 3.11 Material Usage Records

The permittee shall monitor and record monthly, the usage of each RV assembly line material that contains HAPs, TAPs, and/or VOCs. The usage records shall remain on site and shall be made available to DEQ representatives upon request.

### 3.12 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the RV assembly line using the purchase records required by Permit Condition 3.8, the MSDS' required by Permit Condition 3.9, and the material usage records required by Permit Condition 3.11 to demonstrate compliance with Permit Condition 3.3. Records of this information shall be maintained on and shall be made available to DEQ representatives upon request.

### 3.13 **VOC Monitoring Requirements**

The permittee shall monitor and record the monthly and annual VOC emissions from the RV assembly line using the purchase records required by Permit Condition 3.8, the MSDS' required by Permit Condition 3.9 and the material usage records required by Permit Condition 3.11 to demonstrate compliance with Permit Condition 3.4. Records of this information shall be maintained on site and shall be made available to DEQ representatives upon request.

### 3.14 TAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual TAP emissions from the RV assembly line using the purchase records required by Permit Condition 3.8, the MSDS' required by Permit Condition 3.9, and the material usage records required by Permit Condition 3.11 to demonstrate compliance with Permit Condition 3.5. Records of this information shall be maintained on site and shall be made available to DEO representatives upon request.

### 40 CFR 63 Subpart HHHHHH Requirements (If Applicable)

# 3.15 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

Unless an exemption from EPA has been granted to this facility, in accordance with 40 CFR 63.11172(a)(2) and IDAPA 58.01.01.210, on and after the date of initial startup of this facility the permittee shall comply with the emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHHH.

- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f).
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).
  - All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.
  - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
  - Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- The permittee shall ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
  - A list of all current personnel by name and job description who are required to be trained;
  - Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
    - Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;

- Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke:
- Routine spray booth and filter maintenance, including filter selection and installation; and,
- Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHHH.
- A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required are not required to provide the initial training to these painters.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
  - All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
  - Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[12/18/2018]

# 3.16 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Applicability of General Provisions

Unless an exemption from EPA has been granted to this facility, the parts of the General Provisions which apply to the permittee are specified in the following table, in accordance with 40 CFR 63.11174(a).

Subject	Explanation
General Applicability	
Initial Applicability Determination	Applicability of subpart HHHHHHH is also specified in 40 CFR 63.11170.
Applicability After Standard Established	
Applicability of Permit Program for Area Sources	
Notifications	
Definitions	Additional definitions are specified in 40 CFR 63.11180.
Units and Abbreviations	
Prohibited Activities	
Circumvention/Fragmentation	
	General Applicability Initial Applicability Determination Applicability After Standard Established Applicability of Permit Program for Area Sources Notifications Definitions Units and Abbreviations Prohibited Activities

Compliance With Standards and

Maintenance Requirements—Applicability

Table 3.2 Applicability of General Provisions to Subpart HHHHHHH of Part 63

40 CFR 63.6(a)

40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.9(a)-(d)	Notification Requirements	40 CFR 63.11175 specifies notification requirements.
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	
40 CFR 63.9(j)	Change in Previous Information	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.
40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.11177.
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.11176.
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
40 CFR 63.15	Availability of Information/Confidentiality	,,
40 CFR 63.16(a)	Performance Track Provisions—reduced reporting	

[12/18/2018]

# 3.17 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

Unless an exemption from EPA has been granted to this facility, in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a), (b), (d), (g), and (h) as applicable.
  - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
  - Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(3)(i).
  - Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.

- Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

[12/18/2018]

# 3.18 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

Unless an exemption from EPA has been granted to this facility, in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHHH.

- Annual Notification of Changes Report. In accordance with 40 CFR 63.11176, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information.
  - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
  - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHHH or Subpart A General Provisions shall be submitted to both of the following addresses in accordance with 40 CFR 63.13:

EPA Region 10, Mail Stop: OAW-150 1200 Sixth Avenue, Suite 900 Seattle, WA 98101

and.

P-2011.0103

DEQ Twin Falls Regional Office 650 Addison Avenue West, Suite 110 Twin Falls, ID 83301 fax: (208) 736-2194

[12/18/2018]

### 3.19 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

• National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Sources, 40 CFR Part 63, Subpart HHHHHH.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[12/18/2018]

# 4 Woodworking Operations

### 4.1 Process Description

The woodworking operation (EU W-1) consists of various saws, routers, and milling equipment and is equipped with a dust collector that vents internally. The physical design capacity for woodworking operations is 15,000 pounds of wood material per hour.

### **4.2** Control Device Descriptions

A woodworking operation dust collector (CE-1), located and vented to the interior of the building, controls PM<sub>10</sub> from woodworking operations. The following table shows the emission unit and any associated control device.

Table 4.1 Emissions Control Description From Woodworking

Emissions Unit(s)/Processes	Emissions Control Device	Emission Point
Woodworking operation	Dust Collector (PM <sub>10</sub> )	Building 1 doors, windows, and vents <sup>1</sup>

<sup>1)</sup> Dust collector vents inside Building 1

### **Emission Limits**

### 4.3 PM Emissions Limit

Emissions of PM from woodworking shall comply with process weight limits in accordance with the provisions of IDAPA 58.01.01.700-703 using the following equation:

$$E = 0.045(PW)^{0.60}$$

Where:

E = the allowable emission from the entire source in pounds per hour, and

PW = the process weight in pounds per hour. Emission Limits

### 4.4 Opacity Limit

Emissions from the any stack, or any other stack, vent, or functionally equivalent opening associated with the woodworking operation, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

### **Operating Requirements**

### 4.5 Wood Throughput Limits

Wood material to be processed shall not exceed 15,000 lb/hr.

[12/18/2018]

### 4.6 Fugitive Dust

The permittee shall reasonably control emissions of fugitive dust from the facility in accordance with IDAPA 58.01.01.650-651.

### 4.7 **Dust Collector Operations**

The dust collector listed in the emissions control description from woodworking table shall be operated whenever woodworking operations occur.

### 4.8 Dust Collector Maintenance

The permittee shall maintain and operate the dust collector according to manufacturer recommendations and the O&M manual specifications.

## **Monitoring and Recordkeeping Requirements**

## 4.9 Daily Throughput Monitoring

The permittee shall monitor and record the daily amount of wood material processed to demonstrate compliance with the wood throughput limits permit condition. Records of this information shall remain on site and shall be made available to DEQ representatives upon request.

# 5 General Provisions

### **General Compliance**

5.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

5.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

### **Inspection and Entry**

- 5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

### **Construction and Operation Notification**

5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

- **5.6** The permittee shall furnish DEQ written notifications as follows:
  - A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
  - A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

• A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

## **Performance Testing**

- 5.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 5.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 5.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

### Monitoring and Recordkeeping

5.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following:

(a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

### **Excess Emissions**

5.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

### Certification

5.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### **False Statements**

5.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### **Tampering**

5.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### **Transferability**

5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06. [IDAPA 58.01.01.209.06, 4/11/06]

### Severability

5.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]

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